To: Beeler, Cindy[Beeler.Cindy@epa.gov]

Cc: Thomas, Deb[thomas.debrah@epa.gov]; Card, Joan[Card.Joan@epa.gov]; Bohan,

Suzanne[bohan.suzanne@epa.gov]

From: McGrath, Shaun

**Sent:** Wed 10/12/2016 2:14:06 PM

Subject: Re: Beeler Status

## Cindy,

Great to hear from you, and thx for the very informative report. I've copied Suzanne so she's aware of enforcement conversations and outreach to OECA.

Shaun

Sent from my iPad

On Oct 11, 2016, at 8:14 PM, Beeler, Cindy < Beeler. Cindy@epa.gov > wrote:

Shaun, Deb & Joan -

Bonjour! I wanted to check in and let you know I am alive and doing well in Ottawa (where I live) and Gatineau (where I work).

The ECCC methane regulatory group has been very welcoming and they are in the thick of fast-paced work aiming to get a proposed methane oil & gas rule to the Canada Gazette (their Federal Register) in early 2017.

My first week here, ECCC flew me out with them to Calgary to meet in separate meetings with ENGOs (Pembina, EDF and Clean Air Task Force), the Province oil & gas regulators, and Operators and their primary trade association, Canada Association of Petroleum Producers (CAPP). Not nearly the presence of lawyers that we might see in the U.S. I think that ECCC likes to have a USEPA person they can introduce in these meetings with external parties to demonstrate our collaboration.

ECCC has been doing extensive outreach describing how their proposed regulation will cover venting (of associated gas and tank vapours), compressor venting, LDAR, pneumatic devices (controllers and pumps), and HF well completions. This is the first time the feds have regulated emissions from oil gas besides a recent rulemaking on engines. Since this is the first rulemaking, there is quite a bit of low-hanging fruit to achieve the 40-45% methane reductions by 2025.

I get a sense from ECCC folks I've chatted with that they'd like to learn about EPA's enforcement approach, how we interact with our States to ensure a level playing field and our compliance assistance (or compliance promotion as they call it). So, I have reached out to OECA and received some presentation material I can offer to deliver. I've also lined up OAQPS's primary engine rule-writer to provide a webinar on the compliance assistance tools they developed for our engine rules.

I'm continuing some EPA work. Last week we had a meeting with UDAQ on our comparative analyses we're doing on the new Uinta Basin Emission Inventory, Tribal Minor Source Registration data, and Greenhouse Gas Reporting data – all provided by the Operators. This serves two main purposes: (1) ensure we have a solid emission inventory that becomes our new benchmark, and (2) inform our evaluation of the U&O FIP if that moves from proposed to final. UDAQ shared our concerns and would like to further dig into details of our analysis, so we have a webinar setup for next week.

On the UB Aerial IR Survey, Region 8 awarded the noncompetitive grant (!) so all the money is now available to USU (BLM \$90k, UDAQ \$30k and EPA \$25k). However, I think

## Ex. 5 - Deliberative Process

Hope all is well down there!

**Cindy Beeler** 

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